

CC Docket No. 94-102 – E911 Interim Report

Filed by: Keystone Wireless, L.L.C.
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Date: July 31, 2003

To: Marlene H. Dortch, Secretary
Federal Communications Commission
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Washington, D.C. 20554

By Electronic Submission:

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TIER III CARRIER INTERIM REPORT

CC Docket No. 94-102

Keystone Wireless, L.L.C. ("Keystone") hereby submits its E911 Interim Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, FCC 02-210, released July 26, 2002 (*Non-Nationwide Carrier E911 Order*), and *Public Notice*, DA 03-2113, released June 30, 2003.

Carrier Identifying Information:

Carrier Name: Keystone Wireless, L.L.C. – FRN 0007 4157 06

E911 Compliance Officer: James Williams
27500 Riverview Center Blvd., Suite 202
Bonita Springs, FL 34134

E911 Implementation Information:

Keystone is a small wireless carrier serving only rural or other less-densely populated areas. Keystone hereby reports as follows:

- ☐ Keystone has received only one Phase I request and no Phase II requests. Keystone has obtained and installed all of the network equipment and software necessary to meet the PSAP's Phase I request, has installed a landline between the switch and the requesting PSAP for Phase I deployment, and is compliant. Keystone did not encounter any problems in meeting the PSAP's request.
- ☐ Keystone has elected to employ a handset-based solution compatible with the GSM technology of Keystone's PCS network.
- ☐ Keystone has installed all of the necessary network equipment for Phase I E911 deployment. Keystone anticipates a significant problem with its Phase II E911 deployment. Specifically, Keystone elected to use a handset-based solution for its E911 deployment, because it was the only attainable solution, either technically or financially. At the time this Commission adopted its E911 rules, the vendors of GSM handsets promised to develop and sell Phase II-compliant handsets sufficiently in advance of the new deadlines for carriers to meet those deadlines. However, that has not been the case. No vendor of handsets is currently offering, much less manufacturing, Phase II-compliant GSM handset-based solutions. Even when such handsets do come to market, Keystone will not be able to purchase any units until after the major GSM-based carriers, such as AT&T Wireless, Cingular and T-Mobile, have purchased and received all the units they need.

In order for Keystone to deploy Phase II E911, it would have to switch to a network-based solution. Keystone is unable to switch to a network-based solution because it is technically

impossible. For a network-based solution to function, a handset must be located within the reliable service area of at least three cell sites simultaneously, in order to triangulate the position of the handset. Keystone operates only in less densely populated areas where the cell sites are spread far apart and there is little overlap between two cells and even less overlap among three cells. Only a minor portion of Keystone's service area is potentially susceptible to triangulation techniques; the bulk of the service area is not susceptible to triangulation and Keystone could never meet the accuracy levels set forth in Section 20.18 of the Commission's rules, *i.e.*, accuracy within 300 meters 95% of the time on a system-wide basis.

- ☐ Key attempted to obtain ALI-capable handsets prior to the October 1, 2002 deadline. After the handset vendors repeatedly delayed development of such units, they finally admitted no such handsets are going to be developed.
- ☐ Key does not anticipate that Phase II service will be available in its network any time soon, for the reasons discussed above pertaining to the issues with the absence of any available GSM handsets and the impossibility of employing a network-based solution, both of which are beyond Key's control. Key will be filing a request with the Commission for a waiver of the Phase II requirements in the near future.
- ☐ With regard to meeting the ultimate implementation date of December 31, 2005, see above.